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03/19/2025

Hon. Valerie Figueredo  
U.S. Magistrate Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007-1312

Re: Mohamed John Akhtar et al. v. Eric Adams et al.  
23-cv-06585 (JGLC) (VF)

Dear Magistrate Judge Figueredo,

Please accept this "letter motion" on short notice because of the sensitive nature of the contents. I represent plaintiffs in the above captioned matter. With regret, I must report to the Court a disturbing communication I received this morning from pro se defendant Eric M. Eisenberg. That communication came in the form of an email dated today, March 19, 2025, that I have attached as Exhibit 1.

This communication follows an earlier email I received this morning from Mr. Eisenberg in which he continued his abusive remarks. I politely asked him to stop, and explained to him his remarks were hurtful and traumatizing to me. I have made the same request to Mr. Eisenberg in the past. What appears in Exhibit A is his response.

On March 10, 2025, I previously reported to the Court about three separate disturbing emails I had received from Mr. Eisenberg. At the time I received those communications, they were not isolated incidents. I did not ask the Court to take any action, rather, I had hoped that by reporting them, it temper Mr. Eisenberg's conduct. It has not.

I find Mr. Eisenberg's communications to be so disturbing, that they are now having an intimidating impact. While I understand Mr. Eisenberg has a right to represent himself, he does not have a right to denigrate me in such false and vicious terms. In fact, causes me pain to read what he has written me on numerous occasions. I do not believe that any attorney appearing in a district court of the United States must be exposed to such abuse and infliction of trauma

I did not ask for sanctions in my letter to Your Honor of March 10, 2025, and while I think it would be appropriate, I will not ask for them on this occasion as well. I

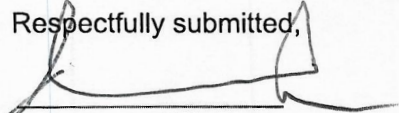
believe they will only serve as a distraction to the case, and I wish to keep the case moving forward.

However, I will ask of the Court to direct Mr. Eisenberg to limit his communications only to substantive matters pertaining to the legal and factual issues pertaining to the case. I accept the fact that Mr. Eisenberg has rights that deserve protection, but I will not respond to his commands, rather, I will only follow directives from the Court.

What I have experienced as counsel for the plaintiffs in the case I have never experienced before, particularly coming from another attorney. So I am not sure exactly what is the right way to respond. But I am certain that the rules of professional responsibility, and because Mr. Eisenberg's communication can have a chilling effect upon the case, I am under a duty to report.

Thank you for Your Honor's attention to the foregoing.

Respectfully submitted,



Anthony N. Iannarelli Jr.  
Attorney for Plaintiffs

CC Via ECF

Ms. Kerri Devine, Esq.

Ms. Genan F. Zilkha

Assistant Corporation Counsels

Via Email

Mr. Eric Eisenberg, Esq.

Defendant *pro se*

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Eric Eisenberg <ericeis@gmail.com>  
To: Anthony Iannarelli <anilaw2@gmail.com>

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Wed, Mar 19, 2025 at 9:47 AM

Dear Mr. Iannarelli,

Also, I want to be very clear about one thing, because you keep trying to shift blame onto your clients or misconstrue my position. What I have been repeatedly stating to you is that you, Anthony Iannarelli, Jr. appear to have targeted the filings based on anti-Jewish bias, deliberately omitting the non-Jewish citizen complainant(s) and citizen prosecutor(s), who you well knew about the existence of, so that the filings you filed target only the Jew. Your protestations that your feelings are hurt are not well taken. My feelings are hurt that you, Anthony Iannarelli, Jr., targeted me, as a Jew, with completely unfounded allegations of religious and racial bias.

And again, please advise by when you will review your file and respond to my questions regarding where else you included my birthdate. The harm, to the extent the information is still available, is ongoing.

Best,  
Eric

EXHIBIT 1